UNITED STATES DISTRICT COURT FOR THE DISTRICT OF VERMONT

JONATHAN A. BLOOM,

Plaintiff,

v.

Civil No. 5:16-cv-121

ALEX AZAR, Secretary of the U.S. Department of Health and Social Services,

Defendant.

JOINT MOTION FOR STAY

Dr. Bloom and the Secretary (collectively, "the parties") jointly move the Court for a fourteen (14) day stay of any ruling on Dr. Bloom's motion for fees under the Equal Access to Justice Act. A stay is in the interests of justice and will allow the parties time to continue ongoing discussions and consider the relevant issues.

Date: June 6, 2018 Respectfully submitted,

By: /s/ Debra M. Parrish

Debra M. Parrish, Esq. (pro hac vice) Bridget M. Noonan, Esq. (pro hac vice)

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By: <u>/s/ Craig S. Nolan</u>

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Dated at Burlington, in the District of Vermont, this 15th day of June, 2018.

CHRISTINA E. NOLAN United States Attorney

By: /s/ Melissa A.D. Ranaldo
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CERTIFICATE OF SERVICE

I, Robert LaMoy, Legal Assistant for the United States Attorney's Office for the District of Vermont, do hereby certify that I electronically filed this **JOINT MOTION FOR STAY** with the Clerk of the Court using the CM/ECF system, which will provide electronic service to the registered participants as identified on the Notice of Electronic Filing (NEF) generated in connection with this document.

I further certify that on the 15th day of June, 2018, I served the following party with this filing via first-class mail:

Bridget M. Noonan, Esq. Parrish Law Offices 788 Washington Road Pittsburgh, PA 15228

Dated at Burlington, in the District of Vermont, this 15th day of June, 2018.

/s/ Robert LaMoy ROBERT LaMOY Legal Assistant P.O. Box 570 Burlington, VT 05401 Tel.: (802) 951-6725

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